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June 6, 2007

Mr. Mike Elabarger
County of Loudoun
Department of Planning
1 Harrison Street, S.E.
P.O. Box 7000
Leesburg, VA 20177-7000

**Re: Dulles South Water Tanks
(1st Submission)
Loudoun County Application Numbers SPEX 2006-0042 & CMPT 2007-0002**

Dear Mr. Elabarger:

This letter includes our responses to staff/agency referral comments that we have received regarding the initial submission of the referenced plan. In order to address issues identified with the initial submission, one of the tanks was eliminated and the site was reconfigured to provide an offset equal to the height.

VIRGINIA DEPARTMENT OF TRANSPORTATION (John Bassett, March 7, 2007)

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|----|-----------------|---|
| 1. | Comment: | Please label state route number of Goshen Road. |
| | Response: | Complied. State route number of Goshen Road (Rte. 616) has been labeled. |
| 2. | Comment: | Applicant should dedicate right of way a minimum of 25' from roadway centerline along state road site frontage. |
| | Response: | As reconfigured, the subject site does not have frontage along Goshen Road. Dedication will be provided with the subdivision of the surrounding tract. |
| 3. | Comment: | A VDOT permit will be required for the entrance. Permit may include but is not limited to verification of adequate sight distance, specification of an appropriate entrance type and adequately addressing drainage issues. We recommend a note to this effect be placed on the plans. |
| | Response: | Acknowledged. A note has been added to the plans. The note can be found on sheet 1, note 17. |

ATTACHMENT 3

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OFFICE OF TRANSPORTATION SERVICES (Shaheer Assad, March 30, 2007)

1. **Comment:** **The applicant should provide all the right-of-way required for the Goshen Road improvements.**

The proposed use will generate few additional trips and not have and impact on the road system. VDOT may require a commercial site entrance.

Response: Acknowledged. As noted in response to same comment offered from VDOT, the reconfigured site does not have frontage along Goshen Road. Dedication will be provided with the subdivision of the surrounding tract.

DEPARTMENT OF PLANNING (Marie Genovese, March 27, 2007)

1. **Comment:** **Delineate all the elements of the river and stream corridor resource, locating development outside of this area.**

Response: Complied. All elements of the river and stream corridor have been delineated and the proposed tanks have been shifted away from the river and stream corridor elements.

2. **Comment:** **Delineate steep and moderately steep slopes, locating development outside of these areas.**

Response: Moderately and very steep slopes have been delineated on the plans in the proposed tank site location and beyond.

3. **Comment:** **Relocate the water storage tanks to a location within cover type 3, preserving cover types 1 and 2 to the maximum extent feasible.**

Response: Pursuant to our meeting, we have shifted the tanks westward to minimize impacts within Cover Type 2. Most of the proposed disturbance occurs within Cover Type 3.

4. **Comment:** **Provide a copy of the visual impact assessment for staff's review.**

Response: Hazen & Sawyer has provided the visual impact assessment under a separate cover.

5. **Comment:** **Mitigate visual impacts by committing to neutral colors that will blend with the background and enhanced buffering.**

Response: The LCSA will paint the tanks with neutral colors (the colors will be consistent with the existing tanks at Broadlands and Brambleton).

6. **Comment:** **Lighting shall be shielded to direct light downward and will be fully cut-off.**

Response: Note #18 has been added to the General Notes on Sheet 1. Note 18 addresses lighting for the proposed tank site in accordance with Section 5-1504 of the Loudoun County Zoning Ordinance.

7. **Comment:** **Lighting at the top of the tanks shall be designed so as not to pose a glare hazard to the communities or roadways.**

Response: General Note #18 on Sheet 1 addresses this comment.

ZONING ADMINISTRATION REFERRAL (Claire Gron, March 22, 2007)

II. CONFORMANCE WITH THE REVISED 1993 LOUDOUN COUNTY ZONING ORDINANCE

1. **Comment:** **Section 6-1310(F). The Applicant indicates that a 50 foot buffer will be provided around the perimeter of the site to mitigate the effects of the water tanks on other uses in the immediate area. However, the 50 foot buffer, as it appears on the plat, is not around the perimeter of the site. It is also not located on what will be the future five (5) acre parcel. Clarify this statement, the location of the 50 foot buffer, the future boundaries of the five (5) acre parcel, especially along Goshen Road (see comment below), and the limits of the special exception.**

Response: The site has been re-designed to provide the undisturbed buffer within the parcel. The access road will require limited clearing though this buffer. The access for the parcel will extend through the adjacent parcel to Goshen Road.

2. **Comment:** **Section 1-103(D)(2). The height limitations of the Zoning Ordinance shall not apply to water tanks "not exceeding in height the distance therefrom to the nearest lot line." Clarify the height of the proposed water tanks, and demonstrate that the water tanks are set back from lot lines, at a minimum, a distance equal to their height. Be advised that if telecommunications antennas will be mounted on the water tanks at a later date, the water tanks must be sufficiently set back (see comment below). There are inconsistencies throughout the application with respect to the proposed height of the water tanks. The special exception plat and page 1 of the Statement of Justification indicate that the water tanks are 170 feet in height, however, page 3 of the Statement of Justification indicates that the water tanks are 150 feet in height. Furthermore, the Building Drawing Elevation and Flood Plan, dated October 2006, indicates that the height of the water storage tank is 172.5 feet.**

Response: The revised site design provides a distance from the tanks to the property line that is equal to the height. We have corrected the inconsistencies regarding the height; the proposed height of the tanks is 170 feet.

3. **Comment:** Table 2-1702. Revise the proposed use on the plat to indicate that the use is Water Storage Tank, not "Public Utility, Water Storage Facility."

Response: The proposed use has been revised to "Water Storage Tank" on Sheet 3.

4. **Comment:** Section 5-621. Note on the plat that Water Storage Tanks are subject to §5-621, Public Utility standards. Revise the minimum parcel area on Sheet 3 to be ½ acre, not 1 acre, pursuant to §5-621(A).

Response: The minimum parcel area has been revised to ½ acre on sheet 3.

5. **Comment:** Sections 5-621(B) and 5-1400. Revise General Note #9 on Sheet 1 and page 5 of the Statement of Justification to clarify that Type IV buffer yards are required pursuant to §5-621(B), not §5-1400. However, the Applicant is correct in that the Type IV buffer yard must be provided in accordance with §5-1414(B)(4). Be advised that §5-600 requirements can be modified by Minor Special Exception only. Label the buffer yards that are illustrated on the special exception plat.

Response: The Statement of Justification and Note #9 on Sheet 1 have been revised to provide the correct references.

6. **Comment:** Table 5-701(C)(3)(a). Revise the Zoning Tabulations to distinguish between yard requirements and buffer yard requirements, as they are two separate and distinct requirements. For example, the Zoning Tabulations state that there is a required "front yard buffer width" of 10 feet. However, in the TR-1 district, the required front yard is 10 feet, and a Type IV front yard buffer is 20 feet.

Response: The zoning tabulations have been revised accordingly.

7. **Comment:** Section 5-1100. Revise the parking tabulation. Staff recommends that parking spaces be provided to accommodate the maximum number of vehicles that might be present at one time.

Response: The parking tabulations have been revised accordingly.

8. Comment: **Section 5-1508. County records indicate that both Moderately (15-25%) and Very (>25%) Steep Slopes are located on the property, and it appears as if one of the water tanks is located in an area of Moderately Steep Slopes. Illustrate both the Moderately and Very Steep Slopes on the plat. Be advised that a locational clearance is required pursuant to §5-1508(F).**

Response: Moderately Steep and Very Steep Slopes have been depicted on the plan. The tanks have been shifted to provide clearance from the sensitive areas.

9. Comment: **Section 6-1101. The Applicant notes, on page 3 of the Statement of Justification, that the communications antennas may be mounted on the water tanks in the future. While Telecommunications Antennas are a permitted use in the TR-1 district per Table 2-1702, a Commission Permit (CMPT) is required pursuant to §6-1101. Staff recommends that this CMPT application be revised to include the telecommunications antennas, so as to avoid the necessity of an additional CMPT at a later date.**

Response: The LCSA does not wish to apply for a commission permit for a potential telecommunications facility on the site at this time. If the LCSA reaches an agreement with a telecommunications company to install antennas on the tank at a future date, the telecommunications company would apply for a Commission Permit.

10. Comment: **Article VIII, "Open Space." Based on the CDP (ZMAP-2002-0013), it appears as if this property constitutes required Open Space for Land Bay 1. Lot coverage in Open Space shall not exceed 1% of the lot. Revise Zoning Tabulations #7 and #11 accordingly.**

Response: The area of the site has increased in order to provide adequate setbacks to permit the required height for the water tanks. We propose to create a lot / parcel for the site and then record an open space easement over 50% of the parcel in conjunction with the easement plat for the site plan. The easement would encompass the buffer yards and the River and Stream Corridor elements surrounding the tanks. The area within the open space easement would be applied to the overall open space requirement for Land Bay 1 of Stone Ridge. With regard to the open space requirements associated with Land Bay 1 pursuant to the CDP for ZMAP 2002-0013, the water tank site does not affect the area of the HOA Passive Park or the overall open space requirement for Land Bay 1.

III. SPECIAL EXCEPTION PLAT COMMENTS

- 1. Comment:** The Building Drawing Elevation and Floor Plan, dated October 2006, indicates that “actual tank dimensions may vary.” Staff recommends that the Applicant specify the maximum square footage for water tanks on the property. Be advised that the maximum square footage approved with this special exception may not be exceeded.

Response: Complied. A new Building Drawing Elevation and Floor Plan has been included with the resubmission.
- 2. Comment:** Revise General Note #1 on Sheet 1, and the Zoning Tabulations on Sheet 3 to specify that the property is zoned TR-1UBF.

Response: Complied. General Note #1 has been revised to say TR-1UBF. Sheet 3 Zoning Tabulations have been revised to say TR-1UBF.
- 3. Comment:** Revise General Note #6 on Sheet 1 to specify that portions of the property lie within areas of major floodplain.

Response: Complied. General Note #6 on Sheet 1 has been revised stating that portions of the property lie within areas of major floodplain.
- 4. Comment:** Revise General Note #16. County records indicate that both Moderately (15-25% and Very (>25%) steep slopes are present on the subject property.

Response: Complied. General Note #16 has been revised to say that both moderately steep and very steep slopes are present on the subject property.
- 5. Comment:** Remove Zoning Tabulations #8, as there is no FAR requirement.

Response: Complied. Zoning Tabulation #8 as been removed.
- 6. Comment:** Remove Zoning Tabulations #14, as there is no landscaping open space requirement.

Response: Complied. Zoning Tabulation #14 has been removed.
- 7. Comment:** Clearly illustrate the right-of-way for Goshen Road on the plat. The proposed future five (5) acre parcel boundary appears to extend not to the right-of-way, but to the centerline of Goshen Road. Please clarify.

Response: Goshen Road is covered by a prescriptive easement. The parcel boundary for MCPI #247-28-4151 is correctly located along the centerline of Goshen

Road.

DEPARTMENT OF BUILDING AND DEVELOPMENT (Todd Taylor, April 4, 2007)

1. **Comment:** Moderately steep slopes are depicted on sheets 2 and 3. However, the area includes slopes that exceed 25 percent. To demonstrate compliance with the Steep Slope Standards in Section 5-1508 of the Revised 1993 Loudoun County Zoning Ordinance (Revised 1993 LCZO), depict moderately steep slopes (15 to 25 percent) and very steep slopes (greater than 25 percent) on sheets 2 and 3, based on the 2-foot topography (i.e. topographical analysis). Please update Note 16 on Sheet 1 accordingly, including a statement indicating that the steep slopes designations are based on 2-foot topography. [Revised 1993 LCZO Sections 5-1508(D) and 6-407].

Response: Complied. Moderately steep and very steep slopes are both being shown on sheets 2 and 3. Note 16 on sheet 1 has been updated.
2. **Comment:** The River and Stream Corridor 50-foot management buffer is incorrectly depicted on sheets 2 and 3. The buffer must surround adjacent steep slopes (greater than 25 percent), starting within 50 feet of floodplains, extending no further than 100 feet beyond the floodplain. Please adjust to buffer accordingly. [Revised General Plan (RGP, River and Stream Corridor Resources Policies, Page 5-6]

Response: Complied. Buffers and River and Stream Corridors have been depicted in accordance the Revised General Plan.
3. **Comment:** Once moderately steep slopes, very steep slopes, and the River and Stream Corridor 50-foot management buffer are depicted correctly, staff strongly recommends shifting the access road and three water tanks to the northwest to avoid land disturbing activities on steep slopes and to allow for the preservation of the existing hardwood tree cover.

Response: Complied. The tanks have been shifted away from the steep slopes.
4. **Comment:** Type 4 buffer yards are depicted around the perimeter of the subject property. Where perimeter buffer yards correspond with forest cover types 1 and 2, as identified by the Stone Ridge Rezoning Cover Type Inventory Report, prepared by Zimar & Associates Inc., dated April 14, 2002, staff recommends that existing vegetation be utilized toward fulfilling buffer yard requirement, consistent with Revised 1993 LCZO Section 5-1403(B).

Response: Except where the access road and water main cross the boundary, the perimeter buffer will be accomplished with existing vegetation that will be supplemented to meet the Type 4 Buffer Yard requirements.

5. Comment: Please describe further the stormwater management/best management practice approach, accounting for water quality requirements and for conveying concentrated flow to the channel of the floodplain.

Response: The plan currently proposes approximately 0.9 Acres of impervious area over the 5.7 acre site. This is less than the 16% threshold that would require water quality measures for the site. We anticipate the site can be designed to avoid concentrating runoff to the adjacent steep slope areas. A potential SWM/BMP/LID facility has been depicted on the plan in the event there is a need to provide a facility to address issues associated with the final engineering.

If you have any question please do not hesitate to contact me at 703-642-2306.

Sincerely,
URBAN, LTD.

Jeffrey L. Gilliland, P.E.
Principal

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